

OFFICIAL FILE
ILLINOIS COMMERCE COMMISSION

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

ORIGINAL
ILLINOIS COMMERCE COMMISSION
2002 DEC 18 P 12:53

Illinois Bell Telephone Company

**Application for review of alternative
regulation plan.**

Illinois Bell Telephone Company

**Petition to rebalance Illinois Bell Telephone
Company's Carrier Access and Network
Access Line Rates.**

**Citizens Utility Board and
The People of the State of Illinois**

-vs-

Illinois Bell Telephone Company

**Verified Complaint for a Reduction in Illinois
Bell Telephone Company's Rates and Other
Relief.**

CHIEF CLERK'S OFFICE
98-0252

98-0335

(cons.)

00-0764

**STAFF RESPONSE TO GCI'S MOTION FOR AN INTERIM ORDER
ON SERVICE QUALITY**

On December 2, 2002, the Governmental and Consumer Intervenors and the City of Chicago ("GCI") jointly filed a Motion for a Second Interim Order, which would consist entirely of determinations regarding Service Quality. In the Motion, GCI requests that the Commission issue a Second Interim Order in this proceeding, taking the provisions from the most recent Proposed Order¹ that relate to Service Quality requirements and performance and adopt them as modifications to the service quality provisions of the 1994 Alternative Regulation Plan in an order focused exclusively on service quality.

Staff agrees with GCI that "service quality is a key issue in this docket" (Motion, Par.

1) and that the telephone service quality is a very important issue in Illinois (Motion, Par. 3),

¹ The Proposed Order that is the subject of Motion is the August 13, 2002 "Final Post Exceptions Proposed Order" prepared on by the ALJs assigned to this docket and available on e-docket, ICC Docket No. 00-0764. A copy of that Proposed Order was attached as Exhibit 1 to the GCI request.

as Staff made clear throughout the proceedings in this matter. This is particularly true with respect to Ameritech, given Ameritech's poor service quality performance that is indisputably established in this record, and recognized in the Proposed Order, and that continues to be of concern. Therefore, Staff supports the proposition that Commission action to put in place the updated Service Quality performance measures and compensatory provisions will be helpful to the Commission's efforts to obtain better quality telecommunications service for the public.

However, Staff does not agree that the issuance of an Interim Order that merely accepts the language of the Proposed Order would best accomplish this goal. Without any intent to reargue these matters, Staff requests that the Commission take into consideration its position that, as reflected in all of Staff's Briefs, Briefs on Exceptions, and in oral argument, the Service Quality provisions set forth in the Proposed Order would be acceptable if 1) the Q or service quality factor is eliminated from the price cap index and subscribers affected by poor service quality are compensated directly through the issuance of credits (see, pages 210 – 211 of the Proposed Order for a statement of Staff's position); and, 2) the Commission Order adopts its wholesale service quality plan from Docket 01-0120 as part of Ameritech's alternative regulation Plan.

Wherefore, the Staff of the Illinois Commerce Commission respectfully suggests that the public will benefit from immediate action from the Commission regarding the Service Quality components of Ameritech's Alt Reg Plan.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "David L. Nixon". The signature is stylized with a large, looping "D" and a long, sweeping "N".

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**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Illinois Bell Telephone Company	98-0252
Application for review of alternative regulation plan.	
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NOTICE OF FILING

PLEASE TAKE NOTICE that we have on this 17th day of December, 2002, filed with the Chief Clerk of the Illinois Commerce Commission, 527 East Capitol Avenue, Springfield, Illinois, the Response of the Staff of the Illinois Commerce Commission, a copy of which is hereby served upon you.

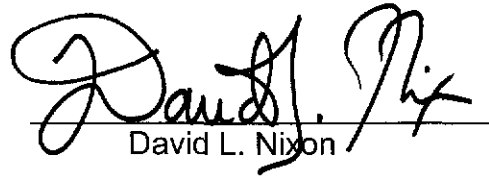


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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the above Notice, together with copies of the document referred to therein, have been served upon the parties to whom the Notice is directed by first-class mail, proper postage prepaid, from Chicago, Illinois, or by e-mail on the 17th day of December, 2002.


David L. Nixon

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